

Neil M. Kliebenstein (SBN: 226060)
 Neil.kliebenstein@bowmanandbrooke.com
 Samuel J. Galvin (SBN: 336930)
 Samuel.gavin@bowmanandbrooke.com
 BOWMAN AND BROOKE LLP
 1741 Technology Drive, Suite 200
 San Jose, CA 95110
 Telephone: (408) 279-5393
 Facsimile: (408) 279-5845

Attorneys for Defendant
 Hitachi Koki U.S.A., Ltd. n/k/a Koki
 Holdings America Ltd.

Jordon Harlan
 jordon@harlanpc.com
 HARLAN LAW, P.C.
 1245 Island Avenue
 San Diego, CA 92101
 Telephone: (619) 870-0802
 Facsimile: (619) 870-0815

Adam J. Kress - Pro Hac Vice
 akress@johnsonbecker.com
 JOHNSON BECKER, PLLC
 444 Cedar Street, Suite 1800
 St. Paul, MN 55101
 Telephone: (612) 436-1800
 Facsimile: (612) 436-1801

Attorneys for Plaintiff
 Timothy Kualih Kahae

IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

TIMOTHY KUALI KAHAE, an
 individual,

Plaintiff,

v.

HITACHI KOKI U.S.A., LTD., a
 Georgia Corporation, and KOKI
 HOLDINGS CO., LTD., a Japanese
 Company,

Defendants.

) Case No. 4:23-cv-05683-JST

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**STIPULATION FOR DISMISSAL
 PURSUANT TO FED. R. CIV. P.
 41(a)(1)(A)(ii)**

COMES NOW the above-named Plaintiff and Defendant by and through their
 undersigned counsel of record, and pursuant to Federal Rule of Civil Procedure
 41(a)(1)(A)(ii), hereby stipulate that the above-captioned matters may be and hereby is

1 dismissed with prejudice, and without costs to either party.

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4 Dated: February 6, 2025

Respectfully submitted,

5 By: /S/ Neil M. Kliebenstein

6 Neil M. Kliebenstein

7 Samuel J. Galvin

8 BOWMAN AND BROOKE LLP

1741 Technology Drive, Suite 200

San Jose, CA 95110

9 Attorneys for Defendant Hitachi Koki

10 U.S.A., Ltd. n/k/a Koki Holdings America

11 Ltd.

12 By: /S/ Adam Kress

13 Adam J. Kress – Pro Hac Vice

14 JOHNSON BECKER, PLLC

444 Cedar Street, Suite 1800

15 St. Paul, MN 55101

16 In associations with:

17 Jordon Harlan

18 HARLAN LAW, P.C.

19 1245 Island Avenue

20 San Diego, CA 92101

21 Attorneys for Plaintiff

22 Timothy Kuali Kahae

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIMOTHY KUALI KAHAE, an)	Case No. 4:23-cv-05683-JST
individual,)	
)	
Plaintiff,)	(PROPOSED) ORDER ON
)	STIPULATION FOR
v.)	DISMISSAL PURSUANT TO
)	FED. R. CIV. P. 41(a)(1)(A)(ii)
HITACHI KOKI U.S.A., LTD., a)	
Georgia Corporation, and KOKI)	
HOLDINGS CO., LTD., a Japanese)	
Company,)	
)	
Defendants.)	

Having considered the Stipulation for Dismissal Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the above-captioned matter is hereby dismissed with prejudice, and without costs to either party.

IT IS SO ORDERED, this 7th day of February 2025.



HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE